

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

2003 JUL 18 A 11:43

RICHARD A. CAMPBELL and
MARY M. CAMPBELL,

CLERK

Plaintiffs,

Case No. 03-40164

Hon.: Paul V. Gadola

vs.



BRIDGEVIEW MARINA, LTD.,
NEEDHAM'S MARINE, LTD., and
CAPTAIN'S YACHTING SERVICE, LTD.,

Defendants.

Potter, DeAgostino, Campbell & O'Dea
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POTTER, DeAGOSTINO, CAMPBELL & O'DEA

PLAINTIFFS' RESPONSE TO ORDER TO SHOW CAUSE

NOW COMES Plaintiffs, Richard and Mary Campbell, through their counsel, Potter, DeAgostino, Campbell & O'Dea, and in response to the Court's Order to Show Cause states the following:

The Court issued an order to show cause why this civil action should not be dismissed for lack of subject matter jurisdiction. Plaintiffs filed the instant action in Federal Court based on diversity jurisdiction, 28 U.S.C. § 1332. Pursuant to 28 U.S.C. § 1332(c)(1), a corporation is considered to be a citizen of the jurisdiction where it is incorporated and where it has its principal place of business.

Jurisdiction in this Court is proper because there is complete diversity of citizenship. A

certified copy of the Corporation Profile Report from the Ministry of Consumer and Business Services for the Province of Ontario for Bridgeview Marina Limited, Captain's Yachting Services Ltd., and Needhams Marine Limited are attached as Exhibits A, B, and C respectively. The Corporate Profile Reports for the Defendants reveal that all of the Defendants are incorporated in Canada and listed as Ontario Business Corporations. In addition, each Defendant's registered office is located in Ontario. Based on the attached certified records establishing that each Defendant is incorporated and has its principle place of business in Ontario, Canada, jurisdiction in this Court is proper. Complete diversity exists between the parties in this matter and this Court is vested with jurisdiction pursuant to 28 U.S.C. § 1332.

WHEREFORE, Plaintiffs request that this Honorable Court consider the certified copies from the Ministry of Consumer and Business Services for the Province of Ontario and accept jurisdiction over this matter pursuant to 28 U.S.C. § 1332.

POTTER, DeAGOSTINO, CAMPBELL & O'DEA



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Dated: July 14, 2003

POTTER, DeAGOSTINO, CAMPBELL & O'DEA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

SEE CASE FILE FOR
ADDITIONAL
DOCUMENTS OR PAGES
THAT WERE NOT
SCANNED